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Attorneys for Class Members Sedee Keita and Eric Ayala

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL LITIGATION

Case No.: 4:20-cv-3919-CW

**DECLARATION OF VICTOR H. YU IN
SUPPORT OF UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS'
ADMINISTRATION MOTION FOR
PROTECTIVE ORDER CONCERNING
THIRD-PARTY CLAIMS BUYOUT
SERVICES (ECF NO. 1015)**

Judge: Hon. Claudia Wilken

I, **VICTOR H. YU**, declare as follows:

1. I am an attorney with the law firm Katz Ruby & Carle LLP. I am over eighteen years of age, am competent to make this declaration, and base this declaration on my personal knowledge. I am duly licensed to practice law before this Court and in the state of California. I am counsel for Mr. Sedee Keita and Mr. Eric Ayala, members of the certified class in this action. Based on personal knowledge or discussions with others of the matters stated herein, if called upon, I could and would competently testify thereto.

2. On August 11, Plaintiffs filed an Administrative Motion for Prospective Order Concerning Third-Party Claims Buyout Services ("Buyout Motion") (ECF No. 1015). That motion,

1 among other things, sought to alter portions of the class-notice materials and to require that
2 settlement payments be made directly to Class Members.

3 3. Upon learning of the relief requested in the Buyout Motion, Messrs. Keita and Ayala
4 are concerned that the requested relief may unduly complicate their efforts to sell their settlement
5 claims and impose additional unnecessary burdens on other Class Members. As a result, both
6 individuals are presently working to present their position to class counsel in the hopes of working
7 out a consensual resolution.

8 4. On August 15, Messrs. Keita and Ayala then retained the undersigned counsel.

9 5. To preserve their ability to file a substantive response to the Buyout Motion while
10 discussions are underway with Class Counsel, Messrs. Keita and Ayala request an extension of
11 time.

12 6. Messrs. Keita and Ayala do not oppose (and thus do not seek an extension for) the
13 portion of the Administrative Motion seeking to reopen the claims period.

14 7. When asked about the requested extension, class counsel indicated that, while they
15 would not file a motion to extend time, they would not oppose the requested extension of time to
16 respond to the claims purchase-related aspect of the Buyout Motion.

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18 I declare under penalty of perjury that the forgoing is true and correct.

19 DATED this 15th day of August 2025.
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Victor H. Yu